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7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 JAMES HOLLINS, individually,

10 Plaintiffs,

11 v.

12 WALMART INC., d/b/a WALMART, a
 13 foreign corporation; and DOES I-X; and ROE
 BUSINESS ENTITIES XI-XX, inclusive,

14 Defendants

15 Case No.: 2:24-cv-00494-CDS-DJA

16 **ORDER
 TO EXTEND DISCOVERY DEADLINES
 (THIRD REQUEST)**

17 IT IS HEREBY STIPULATED AND AGREED, between the parties and their attorneys of
 record, that **the current discovery deadlines to be extended to allow to take depositions of
 experts and treating physicians and to extend deadline of dispositive motion**, pursuant to Local
 18 Rule 26-1(b).

19 **I.**

20 **DISCOVERY COMPLETED TO DATE**

21 1. The parties have conducted the FRCP 26.1 Early Case Conference.

22 2. Plaintiff has produced his Lists of Witnesses and Documents, and supplements
 thereto pursuant to FRCP 26(a) disclosing approximately 1790 pages.

23 3. Defendant has produced his Lists of Witnesses and Documents, and supplements
 thereto pursuant to FRCP 26(a).

24 4. Defendant has propounded Request for Admission (35), Request for Production of

1 Documents (27) and Interrogatories (30) to Plaintiff on May 13, 2024.

2 5. Plaintiff has responded to Request for Admission (35), Request for Production of
3 Documents (27) and Interrogatories (30) on August 2, 2024.

4 6. Defendant has propounded a Second Set of Interrogatories (6) on August 16, 2024.

5 7. FRCP Rule 35b Examination of Plaintiff on September 30, 2024.

6 8. Inspection of the subject premises on October 3, 2024.

7 9. Plaintiff has propounded Request for Production of Documents (18) and
8 Interrogatories (14) to Defendant on October 17, 2025.

9 10. Defendant served its Designation of Initial Experts on October 31, 2024.

10 11. Plaintiff served his Designation of Initial Experts on November 7, 2024.

11 12. Defendant has responded to Request for Production of Documents (18) and
12 Interrogatories (14) on November 25, 2024.

13 12. Defendant has served its First Supplement to Initial Experts on December 4, 2024.

14 13. Defendant has served its Designation of Rebuttal Experts on December 6, 2024

15 14. Deposition of Janette Hollins.

16 15. Deposition of Plaintiff James Hollins.

17 **II.**
18 **DISCOVERY THAT REMAINS TO BE COMPLETED**

19 1. Deposition of Defendant Walmart Inc.'s 30(b)(6) witness(es)

20 2. Deposition of Sarah Brooks

21 3. Deposition of David Elliott, P.E.

22 4. Deposition of Dr. Andrew Manov

23 5. Deposition of Dr. Eric Swanson

24 6. Deposition of Dr. Nathan Richard

25 7. Deposition of Dr. David Hart

26 8. Deposition of Dr. Willis Chang

27 9. Deposition of Dr. Luis Diaz

28 10. Deposition of Dr. Kenneth Chang

11. Any remaining discovery the parties deem relevant and necessary as discovery continues.

III.

REASONS THE PARTIES REQUEST TO EXTEND THE DISCOVERY DEADLINES

5 The parties respectfully submit, pursuant to Local Rule 26-3, that good cause exists for the
6 following requested extension. This Request for an extension of time is not sought for any
7 improper purpose other purpose of delay. Good cause exists for the following reasons: Defendant
8 timely noticed the depositions of Plaintiff's experts and treating physicians. However, due to
9 scheduling conflicts and issues with confirming said depositions with plaintiff's doctors, the
10 parties agreed to extend the current discovery cutoff, with counsel for the parties actively
11 cooperating to set the relevant depositions for dates amenable to all parties. The parties therefore
12 respectfully request the instant extension to permit these depositions be taken to finish necessary
13 discovery for this case.

Extension or Modification of The Discovery Plan and Scheduling Order.

15 LR 26-3 governs modifications or extension of the Discovery Plan and Scheduling Order.
16 Any stipulation or motion to extend or modify that Discovery Plan and Scheduling Order must be
17 made no later than twenty-one (21) days before the expiration of the subject deadline and must
18 comply fully with LR 26-3. If the stipulation is made less than twenty-one (21) days before the
19 expiration of a deadline, the parties must show a good cause exist.

Discovery Deadline	Current Deadline	Proposed Deadline
Motion to Amend/Add Parties	July 9, 2024	July 9, 2024
Initial Expert Disclosures	November 7, 2024	November 7, 2024
All Rebuttal Expert Disclosures	December 6, 2024	December 6, 2024
Discovery Cut-Off Date	January 15, 2025	March 3, 2025
Dispositive Motions	January 22, 2025	March 10, 2025

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The parties represent this Stipulation is sought in good faith and not interposed for delay or any other improper purpose.

Dated this 15th day of January, 2025.

Dated this 15th day of January, 2025.

PACIFIC WEST INJURY LAW

TYSON & MENDES LLP

By: /s/ Kirill V. Mikhaylov

By: /s/ *Griffith H. Hayes*

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IT IS SO ORDERED.

DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE

DATED: January 16, 2025

From: [Kirill Mikhaylov](#)
To: [Nick Psyk](#)
Cc: [Griffith Hayes](#); [Stefania Rota Scalabrin](#); [Michelle Zuniga](#); [Bohdan Cole](#); [Chris Lund](#); [Claudia Corral](#); [Heidi Brown](#); [Alexandria Truelson](#); [Olesya Frolova](#)
Subject: RE: Hollins v. Walmart
Date: Wednesday, January 15, 2025 3:34:09 PM
Attachments: [image010.png](#)
[image011.png](#)

Hi Nick,

You may affix my electronic signature. I will let my litigation team chime in on any confirmed dates. I know they are working with the doctors' offices.

Thank you.

Kirill V. Mikhaylov, Esq.

Partner

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From: Nick Psyk <NPsyk@TysonMendes.com>
Sent: Wednesday, January 15, 2025 1:11 PM
To: Kirill Mikhaylov <Kirill@PacificWestinjury.com>
Cc: Griffith Hayes <ghayes@TysonMendes.com>; Stefania Rota Scalabrin <SRotascalabrin@TysonMendes.com>; Michelle Zuniga <Michelle@PacificWestinjury.com>; Bohden Cole <bohdan@PacificWestinjury.com>; Chris Lund <CLund@TysonMendes.com>; Claudia Corral <Claudia@PacificWestinjury.com>; Heidi Brown <HBrown@TysonMendes.com>
Subject: RE: Hollins v. Walmart
Importance: High

Mr. Mikhaylov,

Please find attached a draft SAO to extend discovery for this case to be submitted today to accommodate the remaining depositions for this case. Please let me know if you have received responses from any of the doctors to confirm a new date for their depositions so we can include any said dates in the stipulation. Otherwise, please let me know if you have any other revisions to the